

McELROY, DEUTSCH, MULVANEY & CARPENTER, LLP
Florina A. Moldovan, Esq.
1300 Mt. Kemble Avenue
P.O. Box 2075
Morristown, New Jersey 07962-2075
(973) 993-8100
Attorneys for Defendants, Trump Hotel &
Casinos Resorts, Inc., Trump Taj Mahal
Associates, Trump Marina Associates, L.P,
Trump Plaza Associates, Trump Indiana,
Inc., Craig D. Keyser, Judy Fisher, Francis
Y. McCarthy, Frederick Cunningham, Theresa
Glebocki, Daniel McFadden, Stephen Oskiera
and Loretta Pickus

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

GARY NOA, ET AL.,

Plaintiffs,

vs.

TRUMP HOTEL & CASINOS RESORTS,
INC., ET AL.,

Defendants.

Civil Action No. 05-cv-776
(JEI/AMD)

NOTICE OF MOTION FOR SUMMARY
JUDGMENT PURSUANT TO
FED.R.CIV.P. 56

Motion Return Date:
June 1, 2007

To: Arthur Stock, Esq.
Berger & Montague, P.C.
1622 Locust Street
Philadelphia, PA 19103
Attorneys for Plaintiffs

Lisa J. Rodriguez, Esq.
Trujillo, Rodriguez & Richards, LLP
8 Kings Highway West
Haddonfield, NJ 08033
Liaison Counsel for Plaintiffs

PLEASE TAKE NOTICE that on a date to be set by the Court, Defendants, Attorneys for Defendants, Trump Hotel & Casinos Resorts, Inc., Trump Taj Mahal Associates, Trump Marina Associates, L.P, Trump Plaza Associates, Trump Indiana, Inc., Craig D. Keyser, Judy Fisher, Francis Y. McCarthy, Frederick Cunningham, Theresa Glebocki, Daniel McFadden, Stephen Oskiera and Loretta Pickus ("Defendants"), through its undersigned counsel, will move before the Honorable Joseph E. Irenas, United States District Judge, at the Mitchell H. Cohen U.S. Courthouse, 1 John F. Gerry Plaza, Camden, New Jersey, for an Order granting summary judgment in favor of Defendants pursuant to Fed. R. Civ. P. 56.

PLEASE TAKE FURTHER NOTICE that in support of their Motion, Defendants will rely on the Brief in Support of Defendants' Motion for Summary Judgment, Statement of Undisputed Material Facts submitted pursuant to L. Civ. R. 56.1, and Certification of Counsel.

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

McELROY, DEUTSCH, MULVANEY &
CARPENTER, LLP
Attorneys for Defendants, Trump
Hotel & Casinos Resorts, Inc.,
Trump Taj Mahal Associates, Trump
Marina Associates, L.P, Trump
Plaza Associates, Trump Indiana,
Inc., Craig D. Keyser, Judy
Fisher, Francis Y. McCarthy,
Frederick Cunningham, Theresa
Glebocki, Daniel McFadden, Stephen
Oskiera and Loretta Pickus

By: /s/FLORINA A. MOLDOVAN
1300 Mt. Kemble Avenue
P.O. Box 2075
Morristown, New Jersey 07962-2075
(973) 993-8100

Dated: April 26, 2007

CERTIFICATION OF SERVICE

I certify that on the date indicated herein, I caused copies of the papers submitted by Defendants in support of their Motion for Summary Judgment pursuant to Fed. R. Civ. P. 56, to be filed electronically with the Clerk, United States District Court, Camden Vicinage, and served electronically to:

Arthur Stock, Esq.
Berger & Montague, P.C.
1622 Locust Street
Philadelphia, PA 19103
Attorneys for Plaintiffs

Lisa J. Rodriguez, Esq.
Trujillo, Rodriguez & Richards, LLP
8 Kings Highway West
Haddonfield, NJ 08033
Liaison Counsel for Plaintiffs

I also caused one courtesy copy of the papers to be sent via overnight mail to:

The Honorable Joseph E. Irenas, Sr., U.S.D.J.
Mitchell H. Cohen U.S. Courthouse
1 John F. Gerry Plaza, Rm. 310
Camden, NJ 08101

The Honorable Ann Marie Donio, U.S.M.J.
Mitchell H. Cohen U.S. Courthouse
Room 5020
1 John F. Gerry Plaza
Camden, NJ 08101

/s/ Florina A. Moldovan
Florina A. Moldovan

Dated: April 26, 2007